

EXHIBIT O

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
EX REL. LAURENCE SAKLAD,)
)
Plaintiff,)
)
v.) C.A. NO. 97-10052-MLW
)
HENRY R. LEWIS AND VANTAGE)
TRAVEL SERVICE, INC.,)
)
Defendants.)
)

PLAINTIFF'S SUPPLEMENTAL INITIAL DISCLOSURE

Pursuant to Fed. R. Civ. P. 26(a)(1), the plaintiff, the United States of America, hereby supplements its Initial Disclosure as follows. The individuals and representatives of the organizations (identified where known) listed below are likely to have discoverable information related to: secret side agreements between non-profit organizations and Vantage, including, but not limited to, the nature and effect on Vantage's direct mail programs of oral representations by Vantage to non-profit organizations; Vantage's knowledge of postal rules and regulations, including, but not limited to, the cooperative mail rule; Vantage's representations with respect to its expertise regarding direct mail programs, including, but not limited to, representations regarding Vantage's expertise with respect to postal rules and regulations; the number of mailpieces Vantage mailed or caused to be mailed under secret side agreements with non-profit organizations; and the number of Forms 3602 that Vantage caused to be executed.

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